



TAGLaw International Lawyers

Terry E. Johnson
Direct Telephone
414-221-6605

terry.johnson@vonbriesen.com

November 14, 2022

Via: Email – stkeeton@keetonfirm.com

Steffan Keeton
The Keeton Firm LLC
100 S. Commons, Ste. 102
Pittsburgh, PA 15212

Re: *Pines Bach, LLP v. Mills*
US District Court – Western District – Case No. 3:22-CV-66
CNA Claim No. LWA45192

Mr. Keeton:

I write with regard to the current situation concerning your expert witness.

We are in the process of finalizing and filing our motion to strike your expert. However, if your expert is going to be permitted to testify, we will need to take his deposition as promptly as we can after the stay ends so that we are in a position to timely name our expert under the current order. While I suspect there is some chance the court is going to adjust the order again given the uncertainty of your right to call an expert and the fact that you never provided a report, we can't count on that.

The only day that Mr. Sage and I are available to depose your expert after January 17 which permits us enough time to digest whatever he has to say and prepare a responsive expert is January 20.

We would therefore like to agree now on taking the deposition of that expert on January 20 if the court has not stricken him before that date. I am prepared to at least consider taking his deposition via zoom.

I would appreciate your advice as to whether we can proceed on that basis.

Very truly yours,

von BRIESEN & ROPER, s.c.

Terry E. Johnson
TEJ:dlc
38937845_1.DOCX

C: Roger Sage – rsage@rogersage.com / Lacy Kielman – lkielman@rogersage.com
Michael A. Mills – mickey@millsmediation.com